American Lung Association.

Lee Zeldin, Administrator
U.S Environmental Protection Agency
William J. Clinton Building
1200 Pennsylvania Ave, NW
Washington, DC 20460

Re: Development of Guidance for Alternative Fuel Vehicles and Fueling Infrastructure Deployment Under the Clean School Bus Funding Programs

Dear Administrator Zeldin:

Thank you for the opportunity to provide comments on the Environmental Protection Agency's (EPA) request for information on the next phase of the Clean School Bus Program (CSBP). The American Lung Association is the nation's oldest voluntary health organization and the trusted champion for lung health. Our vision is a world free of lung disease, and achieving it depends on clean air for all. Continuing EPA's strong track record of getting more clean school buses on the road will help children, teachers and communities breathe easier.

The nation has made great progress in cleaning up air pollution over the past five decades: kids are breathing cleaner air today because of the Clean Air Act and EPA, state and local efforts. But large problems still remain. The American Lung Association's "State of the Air" 2025 report found that nearly half of people in the United States live in areas with unhealthy levels of air pollution. Everyone is susceptible to harm from air pollution exposure, but some people face elevated risk, including children and people with chronic disease.

Vehicle emissions are the largest source of air pollution burdens in much of the nation. Nationally, more than 480,000 school buses are on the road, carrying millions of children every day. The majority of these buses are diesel-powered. There is clear scientific evidence demonstrating the effects of diesel exhaust exposure on the human body, including asthma attacks, premature deaths and cancer. Children are especially vulnerable to poor air quality, as their brains and respiratory systems are still developing. Children also have higher respiration rates, increasing the volume of pollutants they inhale for their body size. Diesel exhaust exposure is linked to serious health effects in children, including asthma attacks and

diminished brain function. These impacts are most severe for children living in communities with higher levels of traffic and air pollution.

Reducing the health harms of diesel school buses is why the Lung Association is a strong supporter of the CSBP. Congress created the program in 2021 under the Infrastructure Investment and Jobs Act. By law, 50% of the awards are required to go toward replacing existing school buses with zero-emission buses – such as electric school buses. Transitioning to zero-emission vehicles on a sector-wide basis will deliver monumental health benefits. Our "Zeroing in on Healthy Air" report revealed the widespread transition to clean electricity and zero-emission cars, buses, and trucks could avoid over 2.7 million asthma attacks and $1.2 trillion in public health benefits by 2050. These benefits reflect avoided premature deaths, reduced hospital visits and fewer missed school days for children living in communities burdened by transportation pollution.

The report also notes that internal combustion engines relying on diesel, propane, compressed natural gas, biodiesel blends, renewable diesel or other alternative fuels identified in the RFI continue to emit pollutants linked to asthma, cardiovascular disease and other serious health impacts. The report further emphasizes that only vehicles without tailpipes eliminate these exposures entirely, underscoring that removing combustion is the most effective way to reduce children's exposure to harmful air pollution.

What's more, the CSBP is meeting the demand of the market. The school bus industry recognizes that the future of school transportation is electric. Electric school buses are safe, clean and have become more affordable as the market invests in more models – and the cost of maintaining an electric school bus is less than that of a diesel bus. This explains why the vast majority of applicants (over 90%) seeking awards under the CSBP have requested funding for electric school buses.

Electric school buses are also the only zero-emission technology currently available at commercial scale for school districts nationwide, and manufacturers have expanded production capacity in recent years to meet this demand. They also provide more stable long-term operating costs, helping school districts plan budgets more effectively.

The American Lung Association strongly supports the agency following the law and ensuring that zero-emission buses – electric school buses – are the priority in application evaluations. This is essential because zero-emission buses eliminate tailpipe emissions entirely, while alternative fuel buses continue to rely on combustion and continue to produce harmful pollutants.

Additionally, we urge EPA to allow the last round of applicants that were awaiting notice to use their applications rather than starting anew. School districts and other eligible entities spent time and resources developing those applications, which should be honored in this next round of consideration. Allowing those applications to carry forward would ensure that districts, especially those with limited administrative capacity, are not disadvantaged through no fault of their own.

Our kids are our future. Investing in safer, cleaner and healthier ways for them to get to school will yield public health benefits that can help carry them into being the nation's next leaders.